

1 J. Napor - by Mr. Sieminski
2 didn't have the money because they owed us old
3 money and they needed additional credit, so it
4 was obvious to us that they had no cash.

5 Q. In other words, under those
6 circumstances you felt like requesting cash
7 up-front prior to duplication would be wasting
8 your time?

9 A. They didn't have money to pay the
10 old bill.

11 Q. So you sent a blank account
12 application to Mr. Parkinson and it is your
13 understanding he filled it out and sent it
14 back. It is Exhibit A of the Complaint.

15 A. That makes it easier. Yes.

16 Mr. Parkinson filled it out on July 24, 1998.

17 Q. Mr. Parkinson listed three trade
18 references and two laboratories/video
19 facilities previously used.

20 Did you talk to any of the trade
21 references, and when I say you, did you on
22 behalf of WRS or to your knowledge anyone else
23 at WRS talk to any of those trade references?

24 A. I did not and I don't know if anyone
25 else did.

EXHIBIT

tables

20